

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 5:24-MJ- 437 (ML)

SCOTT GOODRICH

Defendant

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of March 25, 2020, through April 16, 2021, in the county of Oswego in the Northern District of New York the defendant violated:

*Code Section*

Title 18, United States Code, Section  
2251(a)

*Offense Description*

Sexual Exploitation of a Child

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

LINDSEY R  
VALENTINO

Digitally signed by LINDSEY R  
VALENTINO  
Date: 2024.09.25 14:13:35 -04'00'

*Complainant's signature*

Lindsey Valentino, Special Agent, HSI

*Printed name and title*

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: September 25, 2024

*Miroslav Lovric*

*Judge's signature*

City and State: Binghamton, NY

Hon. Miroslav Lovric, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Lindsey Valentino, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging Scott Brian GOODRICH (“GOODRICH”) with sexual exploitation of a child, in violation of Title 18, United States Code, Section 2251(a).

2. I am a Special Agent employed by the Department of Homeland Security, Homeland Security Investigations (“HSI”) since September 2019. I successfully completed the Criminal Investigatory Training Program and the Homeland Security Investigations Special Agent Training at the Federal Law Enforcement Training Center (“FLETC”) in Glynco, Georgia. While there, I received training in child exploitation investigations. In March 2023, I also received specialized undercover chat training by the Internet Crimes Against Children (“ICAC”) Task Force. As part of my daily duties as an HSI special agent, I investigate and assist in the prosecution of child exploitation and child pornography-related crimes. Also as part of my duties, I have been involved in the execution of numerous child exploitation and child pornography-related search warrants as part of both state and federal investigations, as well as serving as the affiant for such search warrants.

3. The facts set forth in this affidavit are based on my personal knowledge and participation in this investigation; information provided by other individuals, including other law enforcement agents; a review of records related to this investigation; and my experience and training as an HSI special agent. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. Rather, I have set forth only those facts that I believe are necessary to establish

probable cause to believe that GOODRICH has violated Title 18, United States Code, Section 2251(a).

**FACTS ESTABLISHING PROBABLE CAUSE**

4. In or about April of 2024, an online image sharing and hosting service (“Website 1”) submitted a CyberTipline Report (“CyberTip”) to the National Center for Missing and Exploited Children (“NCMEC”), identifying file upload activity of apparent child pornography by a Website 1 user. The phone number associated with the account that uploaded the file in question was registered to Scott GOODRICH, a resident of the Pulaski, New York area. Investigators also identified a past CyberTip from a different online file hosting and sharing service (“Website 2”) that had reported that one of its users had uploaded a file of apparent child pornography in October 2020. The email address and phone number associated with the Website 2 user account in question were identical to the email address and phone number associated with the Website 1 user account that investigators linked to GOODRICH.

5. One of the uploaded files from the April 2024 Website 1 CyberTip is described as follows: One JPG image file with filename 3uyt9opw.jpg, depicting a prepubescent female, approximately 7 to 9 years of age, laying on her back with her legs spread apart. The child’s vagina is exposed and appears to be the focal point of the image.

6. On September 19, 2024, the Oswego County Sheriff’s Department (“OCSD”) obtained a New York State search warrant for GOODRICH’s residence in Pulaski, New York, as well as for vehicles associated with the residence and GOODRICH’s person. Prior to the execution of the search warrant, OCSD conducted a traffic stop on a Chevrolet Traverse being operated by GOODRICH that was seen leaving the residence. OCSD Investigators searched the vehicle pursuant to the warrant and found an Apple iPhone 13 Pro in the vehicle that belonged to GOODRICH.

7. OCSD Investigators advised GOODRICH of his *Miranda* rights during their interaction with GOODRICH during the vehicle stop. GOODRICH waived his *Miranda* rights and agreed to speak with investigators, and the interview was audio-recorded. GOODRICH admitted that the phone number associated with the Website 1 account that had uploaded the file that prompted the April 2024 CyberTip had been his phone number at the time of the CyberTip. GOODRICH provided investigators with the passcode to the seized iPhone 13 Pro.

8. During an initial manual examination of GOODRICH's iPhone 13 Pro conducted pursuant to the state search warrant, investigators opened the phone's native Photos application and found, in two separate folders that appeared to have been manually created and organized by the phone's user, images and videos of Victim 1 ("V1"), a female child who is at this time under the age of 18 and whose identity is known to law enforcement. These images and videos constituted child pornography and appeared to have been produced by the phone's user. GOODRICH was taken into custody and transported to the Oswego County Sheriff's Office.

9. While at the Sheriff's Office, GOODRICH was again advised of his *Miranda* rights. GOODRICH again waived his *Miranda* rights and agreed to speak with investigators during a recorded interview. Investigators showed GOODRICH printed photographs depicting the iPhone 13 Pro displaying the contents of its Photos application. The images shown to GOODRICH were of the suspected produced child pornography depicting V1. Among other images, GOODRICH was shown the following:

- a. A photograph entitled "IMG\_6607," dated March 25, 2020, depicting an adult male's hand pulling aside the shorts of a pubescent female child, approximately 11 to 15 years of age, to reveal the child's vagina.

- b. A photograph entitled “IMG\_6704,” dated April 15, 2020, depicting a male wearing blue boxers with the male’s erect penis protruding from the boxers. A child’s hand is positioned on and touching the erect penis.
- c. A series of still images from a video entitled “IMG\_9190,” approximately 22 seconds in duration, dated April 16, 2021, depicting an adult male penis placed touching or immediately next to the mouth of a sleeping female pubescent child, approximately 11 to 15 years of age.

10. Investigators asked GOODRICH about the identity of the male hand, male penis, and female child depicted in the images and videos. GOODRICH stated that the images and videos depicted his hand and penis, and that the female child was V1. GOODRICH claimed that V1 had been sleeping during each of the various times the photos and videos had been taken. Given the position of GOODRICH’s hand and penis in proximity to V1 as seen in the child pornography files, there is probable cause that GOODRICH was the individual operating the cell phone that was capturing the photographs and video. GOODRICH also admitted that the files he was shown had been created with an Apple iPhone 8 and his iPhone 13 Pro, and that he had personally transmitted some child pornography files from the iPhone 8 to the seized iPhone 13 Pro. Based on my training and experience, I know that all Apple cell phones, including iPhone 8s and iPhone 13 Pros, were manufactured outside the State of New York.

### **CONCLUSION**

11. Based upon the above information, there is probable cause to establish that GOODRICH has violated Title 18, United States Code, Section 2251(a) (sexual exploitation of a child). I respectfully request that the Court issue the proposed criminal complaint and associated arrest warrant pursuant to this violation of federal law.



ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF  
RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

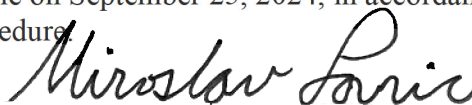
**LINDSEY R  
VALENTINO**

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Lindsey Valentino  
HSI Special Agent

I, the honorable Miroslav Lovric, United States Magistrate Judge, hereby acknowledge that this  
affidavit was attested by the affiant by telephone on September 25, 2024, in accordance with  
Rule 4.1 of the Federal Rules of Criminal Procedure.



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Hon. Miroslav Lovric  
United States Magistrate Judge